

February 4, 2003

Mr. Gary Calleo
R. R. Donnelley & Sons Company
1009 Sloan Street
Crawfordsville, IN 47933

Re: 107-17119
Second Administrative Amendment to
Part 70 107-5963-00052

Dear Mr. Calleo:

R. R. Donnelley & Sons Company was issued a Part 70 permit on June 21, 2002, for a book printing and binding operation. A letter requesting changes to this permit was received on January 17, 2003. The changes requested are related to changing the VOC emission limit for the lithographic printing press 258, from 15 pounds per day to 10 tons per year, in order to maintain the exemption status of the press. This press is not a rotogravure or flexographic press, and is thus exempt from 326 IAC 8-5-5. In addition, since the printing press does not involve 100% coverage of paper, paper coating emission limitations under 326 IAC 8-2-5 do not apply. Therefore, the 10 tons per year limit requested by the source is appropriate for this press. According to 326 IAC 2-7-11(a)(7), an administrative amendment can be used for a change that "revises descriptive information where the revision will not trigger a new applicable requirement or violate a permit term". The requested changes meet the above requirement, therefore, pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (~~strikeout~~ to show deletions and **bold** to show additions):

(1) Condition D.3.1(a) is amended as follows:

Exempt Construction and Operation Status CP 107-4781 issued September 28, 1995 (Press 258) is **replaced by a new limitation on potential to emit of 10 tons per year.** ~~still in effect, any~~ **Any** change or modification which may increase the volatile organic compound potential emissions to more than **10 tons per year** ~~15 lbs per day~~ must be reported to IDEM, OAQ.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

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cc: File - Montgomery County
U.S. EPA, Region V
Montgomery County Health Department
Air Compliance Section Inspector - Jim Thorpe
Compliance Data Section - Karen Nowak
Administrative and Development

Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**R.R. Donnelley & Sons Company
1009 Sloan Street
Crawfordsville, Indiana 47933**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T107-5963-00052	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 21, 2002 Expiration Date: June 21, 2007

1st Administrative Amendment No. 107-16731

Issuance Date: To be Issued

2 nd Administrative Amendment No. 107-17119	Pages Modified: 38
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:February 4, 2003

time to 5000 hours per year; and PC (54) 1853 issued October 20, 1990 limiting impressions, and usage of ink, fountain solution, and cleaning solution, maintain a log of information and submit a quarterly report for monthly hour usage are replaced with the new limits.

The requirements from PC (54) 1746 issued on May 3, 1989 (Press 245) limiting hours of operation, limiting by press description, maintenance of a log of information and quarterly reporting of hours used ; PC (54) 1740 issued on April 5, 1989 (Press 293) limiting hours of operation, limiting by press description; Registered Construction (107) 2045 issued October 17, 1991 (Press 294) limiting by press description and pound per hour of ink and solution usage; Registered Construction and Operation Status CP 107-2947 issued April 23, 1993 (Press 296) limiting by press description; and Registered Construction and Operation Status CP 107-3433 issued January 21, 1994 (Press 296) limiting by press description are replaced with the new limits. Descriptions in Title V operating permits are for descriptive information and do not constitute enforceable conditions.

The requirements from PC (54) 1257 issued July 11, 1978 (Press 287 and Press 288), PC (34) 1285 issued on September 6, 1978 (Press 286) and PC (54) 1398 issued on June 18, 1979 limiting hydrocarbons (Press 270) and requiring the use of non-photochemically reactive hydrocarbons, are replaced because these presses were constructed prior to January 1, 1980 and are not subject to Article 8 rules. Also included are presses Press 285, Press 254, Press 272, Press 274 and Press 276 which were also built prior to January 1, 1980.

Exempt Construction and Operation Status CP 107-4781 issued September 28, 1995 (Press 258) is replaced with a new limitation on potential to emit of 10 tons per year. Any change or modification which may increase the volatile organic compound potential emissions to more than 10 tons per year must be reported to IDEM, OAQ.

Remaining presses will be limited as follows:

- (b) The VOC content delivered to the applicator of the press shall be limited such that VOC emitted is less than twenty-five (25) tons combined pressroom emissions from Press 232 and Press 233 (combined) per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. VOC emitted will be based on the following equation:

VOC emissions (tpy)= (ink usage X volatile content X 80% flash off)+ (fountain solution usage X volatile content X 100% flash off) + (cleaner usage X volatile content X 50% flash off)

The requirements from Registered Construction and Operation Status (107) 2042 issued on July 11, 1991 (Press 232 and Press 233) to use an ultraviolet light curing system to limit VOC releases from the ink, the requirements to use a less volatile printing aid than isopropyl alcohol* and limiting fountain solution to 2.5 percent VOC per gallon is being replaced with new language and limits because in order to maintain consistency in permit language, reporting and monitoring, it is intended to limit the VOC, rather than hours, impressions and limiting volatile content of solutions or press descriptions. Descriptions in Title V operating permits are for descriptive information and do not constitute enforceable conditions.

Amendment 107-10512-00052 issued March 15, 1999 allowed usage of isopropyl alcohol at 750 pounds per year as part of the fountain solution and shall remain in effect.

- (c) Pursuant to CP 107-4233 issued April 20, 1995, VOC input usage to Presses Press 242